

Exhibit 5

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JARROD STRINGER, et al.

Plaintiffs,

v.

RUTH HUGHS, in her official capacity as Texas
Secretary of State and STEVEN C. MCCRAW, in
his official capacity as Director of the Texas
Department of Public Safety

Defendants.

Civil Action Case No. 5:20-cv-00046-
OLG

**DECLARATION OF SARA SCHAMBURG IN SUPPORT OF PLAINTIFFS' MOTION
FOR SUMMARY JUDGMENT AND IN OPPOSITION TO DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT**


Pursuant to 20 U.S.C. § 1746, I, Sara Schamburg, testify that:

1. I am over the age of 18, have personal knowledge of the facts below, and can competently testify to their truth.
2. I am currently employed as the Director of Voter Protection & Deputy Policy Director by the DSCC.
3. DSCC has spent significant resources on voter registration during this election cycle, and in past election cycles.
4. DSCC transfers funds to the Texas Democratic Party ("TDP") to support its budget, and TDP's key budgetary goals include its extensive voter registration efforts. DSCC understands that TDP field staff are responsible for registering voters across the state of Texas.
5. Thus far, the DSCC has spent nearly \$200,000 in Texas for the current election cycle. DSCC anticipates spending into the millions in Texas this cycle given the competitiveness of 2020 Senate race and the fact that DSCC is aware of several obstacles Texas has put into place to turn out voters. This includes anticipated spending on voter registration efforts.

6. If the State of Texas complied with constitutional requirements, then the money DSCC transfers to TDP could be spent on additional outreach to more unregistered voters rather than on educating its staff, consultants, and voters on how to avoid disenfranchisement as a result of Defendants' failure to offer simultaneous voter registration updates when a voter updates driver's license information online.
7. DSCC represents the interests of Democratic voters and donors, and considers them to be its constituents or supporters.
8. Democratic voters and constituents provide financial support in the form of political contributions to DSCC and candidates supported by the DSCC on a regular basis, as demonstrated by the documents produced by DSCC in this litigation and by publicly available FEC filings. *See, e.g.*, ECF No. 86-1 at 30-31; ECF No. 86-3 at 106-110; ECF No. 86-4 at 77-84, 132-133.
9. Democratic voters help elect the leadership of the DSCC by electing candidates to the United States Senate.
10. Democratic voters participate in DSCC's strategy by responding to surveys and polls, as demonstrated by the documents produced by DSCC in this litigation. *See, e.g.*, ECF No. 86-5 at 22-25, 31-33, 34-37, 46-47, 57-59.
11. DSCC considers the individual plaintiffs in this action, John Harms, Jarrod Stringer, and Nayeli Gomez, to be constituents or supporters of the DSCC. Indeed, Plaintiff Jarrod Stringer made three contributions to DSCC during the 2018 election cycle. *See* Attachment A. DSCC represents the interests of the individual plaintiffs.
12. I have reviewed the declaration of Ms. Jada Thompson. The DSCC considers Ms. Thompson to be a constituent or supporter of the DSCC because of her identification as a Democrat and her intention to support Beto O'Rourke, a Democratic candidate for U.S. Senate. DSCC represents Ms. Thompson's interests.
13. As a direct result of Defendants' conduct, Democratic voters like Ms. Thompson and the individual plaintiffs in this action have been disenfranchised and unable to cast ballots in support of DSCC's candidates. Defendants' conduct harms DSCC's electoral prospects because it makes it more difficult for DSCC's members and constituents to cast ballots for Democratic candidates that are counted.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 26, 2020.

DocuSigned by:

37D9F3D6FE63468...
Sara Schaumburg
Director of Voter Protection & Deputy Policy
Director
DSCC

Attachment A

Image# 201804069103539817

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**FEC
FORM 3X****REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines.

12FE4M5

ActBlue

ADDRESS (number and street)

PO Box 382110

Check if different
than previously
reported. (ACC)

Cambridge

MA

02238

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C C00401224

3. IS THIS
REPORTNEW
(N)

OR

AMENDED
(A)

4. TYPE OF REPORT

(Choose One)

(a) Quarterly Reports:

- ☐ April 15
Quarterly Report (Q1)
- ☐ July 15
Quarterly Report (Q2)
- ☐ October 15
Quarterly Report (Q3)
- ☐ January 31
Year-End Report (YE)
- ☐ July 31 Mid-Year
Report (Non-election
Year Only) (MY)
- ☐ Termination Report
(TER)

(b) Monthly
Report
Due On:

- ☐ Feb 20 (M2) ☐ May 20 (M5) ☒ Aug 20 (M8) ☐ Nov 20 (M11)
(Non-Election
Year Only)
- ☐ Mar 20 (M3) ☐ Jun 20 (M6) ☐ Sep 20 (M9) ☐ Dec 20 (M12)
(Non-Election
Year Only)
- ☐ Apr 20 (M4) ☐ Jul 20 (M7) ☐ Oct 20 (M10) ☐ Jan 31 (YE)

(c) 12-Day
PRE-Election
Report for the:

- ☐ Primary (12P) ☐ General (12G) ☐ Runoff (12R)
- ☐ Convention (12C) ☐ Special (12S)

Election on

M M M / D D D / Y Y Y Y Y Y

in the
State of(d) 30-Day
POST-Election
Report for the:

- ☐ General (30G) ☐ Runoff (30R) ☐ Special (30S)

Election on

M M M / D D D / Y Y Y Y Y Y

in the
State of

5. Covering Period

M M M / D D D / Y Y Y Y Y Y
07 01 2017

through

M M M / D D D / Y Y Y Y Y Y
07 31 2017

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Hill, Erin, , ,

Type or Print Name of Treasurer

Signature of Treasurer

Hill, Erin, , ,

[Electronically Filed]

Date

M M M / D D D / Y Y Y Y Y Y
03 30 2018

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

Office
Use
Only**FEC FORM 3X**
Rev. 05/2016

SCHEDULE A (FEC Form 3X)**ITEMIZED RECEIPTS**Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 0924 OF 626482

(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17			

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

ActBlue

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

A. STRINGER, JARROD, , ,

Mailing Address 623 DONALDSON AVE 8

City
SAN ANTONIOState
TXZip Code
78201FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
UNIVERSITY OF TEXAS AT SAN ANTONIOOccupation (for Individual)
PROFESSOR

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

5.00

Date of Receipt

M M M	/	D D D	/	Y Y Y Y Y Y
07	/	18	/	2017

Transaction ID : SA11AI_87144145

Amount of Each Receipt this Period

5.00

☐ Memo Item

Earmark

Earmarked for DSCC (C00042366)

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

B. STRINGER, JARROD, , ,

Mailing Address 623 DONALDSON AVE 8

City
SAN ANTONIOState
TXZip Code
78201FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
UNIVERSITY OF TEXAS AT SAN ANTONIOOccupation (for Individual)
PROFESSOR

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

70.00

Date of Receipt

M M M	/	D D D	/	Y Y Y Y Y Y
07	/	31	/	2017

Transaction ID : SA11AI_88052937

Amount of Each Receipt this Period

10.00

☐ Memo Item

Earmark

Earmarked for TEXAS DEMOCRATIC PARTY -
FEDERAL ACCOUNT (C00099267)

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

C. STRINGER, JESSICA, , ,

Mailing Address 348 COBBLESTONE COURT

City
CHAPEL HILLState
NCZip Code
27514FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
SHANNON MEDIA INCOccupation (for Individual)
EXECUTIVE EDITOR

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

5.00

Date of Receipt

M M M	/	D D D	/	Y Y Y Y Y Y
07	/	18	/	2017

Transaction ID : SA11AI_87143099

Amount of Each Receipt this Period

5.00

☐ Memo Item

Earmark

Earmarked for SWING LEFT CONDUIT (C00632133)

SUBTOTAL of Receipts This Page (optional)..... ►

TOTAL This Period (last page this line number only)..... ►

20.00

Image# 201804069104166656

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Dec 20 (M12)
(Non-Election
Year Only)

Apr 20 (M4)



Jul 20 (M7)



Oct 20 (M10)



Jan 31 (YE)

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Convention (12C)



Special (12S)

Election on

M M M /

D D D /

Y Y Y Y Y Y Y Y

in the
State of(d) 30-Day
POST-Election
Report for the:

General (30G)



Runoff (30R)



Special (30S)

Election on

M M M /

D D D /

Y Y Y Y Y Y Y Y

in the
State of

5. Covering Period

M M M /

D D D /

Y Y Y Y Y Y Y Y

through

M M M /

D D D /

Y Y Y Y Y Y Y Y

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Hill, Erin, , ,

Type or Print Name of Treasurer

Signature of Treasurer

Hill, Erin, , ,

[Electronically Filed]

Date

M M M /

D D D /

Y Y Y Y Y Y Y Y

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Office
Use
Only**FEC FORM 3X**
Rev. 05/2016

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for each category of the
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(check only one)

PAGE 0460 OF 619300

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17			

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NAME OF COMMITTEE (In Full)

ActBlue

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

A. STRINGER, JANET, , ,

Mailing Address 14 GARNET DR

City
LITTLE FALLSState
NJZip Code
07424FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
NOT EMPLOYEDOccupation (for Individual)
NOT EMPLOYED

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

20.00

Date of Receipt

M M M	/	D D D	/	Y Y Y Y Y Y
08		31		2017

Transaction ID : SA11AI_90034146

Amount of Each Receipt this Period

20.00

☐ Memo Item
 Earmark
Earmarked for DAVID RICHARDSON FOR
CONGRESS (C00649087)

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

B. STRINGER, JANET, , ,

Mailing Address 14 GARNET DR

City
LITTLE FALLSState
NJZip Code
07424FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
NOT EMPLOYEDOccupation (for Individual)
NOT EMPLOYED

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

13.51

Date of Receipt

M M M	/	D D D	/	Y Y Y Y Y Y
08		31		2017

Transaction ID : SA11AI_90034166

Amount of Each Receipt this Period

2.00

☐ Memo Item
 Contribution to Act Blue

Contribution to ActBlue

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

C. STRINGER, JARROD, , ,

Mailing Address 623 DONALDSON AVE 8

City
SAN ANTONIOState
TXZip Code
78201FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
UNIVERSITY OF TEXAS AT SAN ANTONIOOccupation (for Individual)
PROFESSOR

Receipt For:

☐ Primary ☐ General
☐ Other (specify)

Aggregate Year-to-Date ▼

10.00

Date of Receipt

M M M	/	D D D	/	Y Y Y Y Y Y
08		18		2017

Transaction ID : SA11AI_89070716

Amount of Each Receipt this Period

5.00

☐ Memo Item
 Earmark

Earmarked for DSCC (C00042366)

SUBTOTAL of Receipts This Page (optional).....▶

27.00

TOTAL This Period (last page this line number only).....▶

Paper report unavailable in FEC system; screenshots of contribution details from FEC website below:

Open image

Contributor information	
Name	STRINGER, JARROD
City and state	SAN ANTONIO, TX, 78201
Occupation	PROFESSOR
Employer	UNIVERSITY OF TEXAS AT SAN ANTONIO
Year to date	\$10.00

Contribution information	
Amount	\$10.00
Receipt date	January 19, 2018
Report year	2018
Memo	EARMARKED FOR DSCC (C00042366)
Reported on	Form 3X on line 11A1
Election type	

Recipient information	
Committee	ACTBLUE
Political party	
Type	PAC with Non-Contribution Account - Qualified
State	Massachusetts